

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND, SOUTHERN DIVISION

NICOLE M. BRUNO)
Plaintiff)
vs.) Civil Action, File Number
DONALD ENSTE dba DANDY DONS)
Defendant)
MOTION FOR LEAVE TO AMEND COMPLAINT

COMES NOW Plaintiff, Nicole M. Bruno, by and through her attorneys, Danny R. Seidman and Donahue, Seidman & Schreyer, and moves for Leave to Amend the Complaint, pursuant to F.R.C.P. Rule 15(a) and Local Rule 103.6, and states as follows:

1. On or about February 4, 2003 the Plaintiff filed the initial complaint in the above-captioned matter against Donald Enste dba Dandy Dons.
2. Subsequently, when the Plaintiff received the Defendant's Initial Disclosures under Rule 26(a)(1), the Plaintiff discovered that Donald Enste is the owner of No Stress Here, Inc., which was the corporation doing business as Dandy Don's Biking Beach Rentals.
3. Plaintiff seeks to amend her Complaint to add No Stress Here, Inc. as a Defendant in this matter. (See Amended Complaint attached hereto)
4. Defendant, Donald Enste dba Dandy Dons has consented to the proposed Amended Complaint.

WHEREFORE, Plaintiff, Nicole Bruno, respectfully requests this Honorable Court issue

an Order permitting the Plaintiff to amend her Complaint to add No Stress Here, Inc. as a Defendant.

Respectfully submitted,

DONAHUE, SEIDMAN & SCHREYER, LLC

By: _____/s/
Danny R. Seidman
8 Post Office Road
Waldorf, MD 20602
(301) 870-9997
Federal Bar No.: 06441

Attorney for Plaintiff

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 2nd day of June , 2003, I electronically transmitted, to Andrew B. Greenspan, Esquire at greensa@nationwide.com a copy of the Motion for Leave to Amend Complaint and Order and that I will retain the original of this document in my possession, without alteration, until the case is concluded in this Court, the time for noting an appeal has expired, and any appeal noted has been decided.

Respectfully submitted,

DONAHUE, SEIDMAN & SCHREYER, LLC

By: _____/s/
Danny R. Seidman
8 Post Office Road
Waldorf, MD 20602
(301) 870-9997

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Attorney for Plaintiff

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Defendant)

ORDER

The Court, having considered the Plaintiff's Motion for Leave to Amend Complaint and having considered any response thereto,

IT IS HEREBY this _____ day of _____, 2003 by the United States District Court for the District of Maryland, Southern Division

ORDERED that the foregoing Motion be and the same is hereby granted; and it is further

ORDERED that the Plaintiff's Amended Complaint, which was filed as an attachment hereto, shall be accepted for filing; and it is further

ORDERED that a summons be issued to No Stress Here, Inc.

Judge